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2 THE HONORABLE RICHARD A. JONES
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JILL ALEXANDER, an individual,
Plaintiff,

vs.

THE BOEING COMPANY, a corporation
doing business in the State of Washington,

Defendant.

NO. 2:13-CV-01369 RAJ

JOINT STATUS REPORT

On August 14, 2013, the undersigned counsel conferred in accordance with FRCP 26(f) and submit this Joint Status Report pursuant to Western District Local Rule 16(a), and Federal Rule of Civil Procedure 26(f):

1. **Nature and Complexity of the Case.** This case involves claims by Plaintiff for disability discrimination based upon the Washington Law Against Discrimination (“WLAD”); claims for failure to accommodate, retaliation and wrongful discharge based upon the WLAD; and claims of interference with rights under the Family and Medical Leave Act (“FMLA”) and the Washington Family Leave Act (“WFLA”). Defendant denies all Plaintiff’s claims, and asserts that Plaintiff is not entitled to relief under any legal theory. Discovery and trial are not expected to be complex.

JOINT STATUS REPORT - 1

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Seattle, WA 98122
(206) 324-8969 Fax: 860-3172

1 2. **Alternative Dispute Resolution Method.** The parties agree to alternative
2 dispute resolution and agree that mediation is the preferred method of ADR.
3

4 3. **Alternative Dispute Resolution Deadline.** The parties anticipate mediation
5 taking place no later than May 1, 2014.
6

7 4. **Deadline for Joining Additional Parties.** Additional parties should be joined
8 no later than February 14, 2014.
9

10 5. **Proposed Discovery Plan.**

11 A. FRCP 26(f) conference took place on August 14, 2013. Initial disclosures were
12 exchanged on September 13, 2013.
13

14 B. The parties agree that discovery in this case should not be conducted in phases.
15 The parties do not propose specific limitations on discovery at this time, although discovery will
16 be conducted on plaintiff's claims, defenses and affirmative defenses asserted by defendant, and
17 damages allegedly suffered by plaintiff.
18

19 C. At this point the parties have not identified any necessary changes or limitations
20 on discovery allowed under the Federal and Local Civil Rules. The parties will manage ESI
21 discovery in accordance with the Model Protocol Regarding Discovery of Electrically Stored
22 Information.
23

24 D. The parties will manage discovery so as to minimize expense by working
25 cooperatively to focus discovery on disputed issues. Parties will also accept service of
discovery related documents, such as interrogatories and requests for production and deposition
notices, via email.
26

1 E. The parties are not aware at this time of any other discovery orders to be entered
2 by the Court.

3 6. **Discovery Completion Date.** The parties propose that discovery should be
4 completed 120 days prior to the date the case will be set for trial, or April 13, 2014.

5 7. **Use of Magistrate to Conduct Proceedings.** Parties do not consent to trial by a
6 Magistrate.

7 8. **Bifurcation.** Parties do not agree to bifurcation of trial.

8 9. **Pretrial Statements and Order.** Parties do not want to dispense with either the
9 pretrial statements or the pretrial order.

10 10. **Other Suggestions for Shortening/Simplifying the Case:** Neither party
11 proposes any further suggestions for shortening or simplifying this case.

12 11. **Trial Date:** Both parties are available for trial the week of August 11, 2014.

13 12. **Jury Trial.** Plaintiff has demanded trial by jury.

14 13. **Number of Trial Days Required.** The parties require four trial days.

15 14. **Trial Counsel Contact Information:**

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4

5 DATED this 31st day of October, 2013.
6

7 /s/
8 Reba Weiss, WSBA #12876
9 Teller & Associates
10 Attorneys for Plaintiff
11

12 /s/
13 James Sanders
14 Zachary P. Jones
15 Perkins Coie LLP
16 Attorneys for Defendant
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